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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE: ALTA MESA)
RESOURCES, INC.) CASE NO. 4:19-cv-00957
SECURITIES LITIGATION)

ORAL VIDEOTAPED DEPOSITION

MARK CASTIGLIONE

July 7, 2023

ORAL VIDEOTAPED DEPOSITION OF MARK CASTIGLIONE,
produced as a witness at the instance of the
Plaintiff and duly sworn, was taken remotely by Zoom
in the above-styled and numbered cause on the 7th day
of July, 2023, from 12:14 p.m. Central to 3:18 p.m.
Central, before Shauna Foreman, Certified Shorthand
Reporter in and for the State of Texas, reported by
computerized stenotype machine, pursuant to the
Federal Rules of Civil Procedure and the provisions
stated on the record or attached hereto.

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| <p style="text-align: right;">Page 62</p> <p>1 came on. However, this was a look as of 2 September 30th of 2018. So nine months after those 3 wells had come on. You -- as I mentioned just a 4 second ago, a lot of the wells would come on 5 performing above the type curve but go on a steep 6 decline, and you really needed six months' of 7 production data in order to know what the EUR is. 8 My point is I just wanted to highlight 9 that you didn't know -- those wells that were coming 10 on at the end of 2017, you didn't know they were poor 11 performers at that point. 12 Q. (BY MR. SMITH) What about the wells that 13 came on-line shortly after the beginning of 2017? 14 MR. PETERS: Objection. Form. 15 (Simultaneous cross-talk.) 16 Q. (BY MR. SMITH) You would have enough data 17 there, wouldn't you? 18 A. Not -- not right after they are drilled. 19 Q. But by nine months later, you would have 20 sufficient data? 21 A. Yes. Yes, or -- yes. We -- we felt like 22 once you had six months' worth of data, you had a lot 23 better handle on what the EUR could be. 24 Q. That's basically all I have on that 25 document.</p> | <p style="text-align: right;">Page 64</p> <p>1 you inquire of Mr. Hackett why he believed that the 2 draft presentation that Mr. Chappelle had put 3 together was at least in certain respects misleading? 4 MR. PETERS: Objection to form. 5 A. I don't recall making that inquisition. 6 Q. (BY MR. SMITH) Okay. Do you recall what 7 the -- what the intended purpose of this deck was at 8 the time? Strike that. 9 Did you gain any understanding from 10 Mr. Hackett of what the purpose for this deck was at 11 the time? 12 MR. PETERS: Objection to form. 13 A. No, I don't remember that. 14 Q. (BY MR. SMITH) Do you recall there being a 15 board meeting in December 2018 or about then when the 16 board decided to terminate certain executives at the 17 company? 18 A. I was -- I was aware of such a meeting, 19 yes. 20 Q. Did you attend that board meeting? 21 A. I did not. 22 Q. All right. You can set that document 23 aside. I just have some follow-up questions for 24 your -- your CV. 25 A. Okay.</p> |
| <p style="text-align: right;">Page 63</p> <p>1 MR. SMITH: Bring up Exhibit 434, 2 please. 3 Q. (BY MR. SMITH) Mr. Castiglione, we've 4 brought up an exhibit that's been previously marked 5 as Exhibit 434. 6 A. Okay. 7 Q. You are a recipient to this e-mail. 8 Really, I don't have a lot of -- I don't have any 9 questions about the -- the attachment at all. 10 A. Okay. 11 Q. But I do have some questions about 12 the -- the e-mail. To the extent that you need to 13 refer to the attachment for context, feel free to do 14 so. So just let me know when you're ready to field 15 some questions. 16 A. Okay. Thank you. Give me just a second. 17 Q. Uh-huh. 18 A. (Witness reviews the document.) Okay. 19 Q. Okay. Hold on one second. 20 Okay. Mr. Castiglione, I want to 21 direct your attention to this December 16th, 2018, 22 e-mail from Mr. Hackett to Mr. Limbacher, 23 Mr. Campbell, and yourself. 24 I just want to ask you some 25 questions -- do you recall why Mr. Hackett -- or did</p> | <p style="text-align: right;">Page 65</p> <p>1 Q. If you want to give me a seven-minute 2 break, we can go off the record and I can finish up. 3 A. Great. 4 MR. PETERS: Thank you. Could we 5 actually get 10 on our side? We just need to run to 6 the restroom, might need a few more minutes. 7 VIDEOGRAPHER: All in agreement with 8 going off the record, we're going off the record at 9 1:58 p.m. 10 (Recess from 1:58 p.m. to 2:17 p.m.) 11 VIDEOGRAPHER: We are going back on 12 the record at 2:17 p.m. 13 Q. (BY MR. SMITH) Welcome back, 14 Mr. Castiglione. Do you have Exhibit 718, your CV, 15 open? 16 A. I do now, yes. 17 Q. Thank you. 18 I want to focus -- focus some 19 questions under the client Alta Mesa Resources part 20 of your CV on the first page. And what I want to do 21 is I want to start off with the roles line there. 22 You indicate that you were the 23 executive vice president and chief of staff between 24 January 2019 and September 2019; is that correct? 25 A. Yes.</p> |

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